

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON INC., PELVIC REPAIR SYSTEM  
PRODUCTS LIABILITY LITIGATION

MDL No. 2327

HONORABLE JUDGE  
JOSEPH R. GOODWIN

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**UNOPPOSED MOTION FOR APPOINTING HON. JAMES ROSENBAUM AS SPECIAL  
MASTER FOR PRIVATE SETTLEMENT AGREEMENT BETWEEN ETHICON AND  
CERTAIN PLAINTIFFS' COUNSEL**

Zimmerman Reed LLP, as counsel for certain plaintiffs in this MDL 2327, hereby moves the Court for entry of an Order to appoint the Hon. James Rosenbaum as Special Master to perform certain defined functions related to the administration and implementation of the Confidential Master Settlement Agreement as agreed by plaintiffs' counsel Zimmerman Reed LLP and defendants Ethicon, Inc. and Johnson & Johnson (collectively "Ethicon"). Specifically, as agreed by the parties, Hon. James Rosenbaum, as the Special Master for the administration of the confidential settlement, will perform certain duties of the Special Master, in furtherance of the fair and efficient administration and implementation of the settlements. This Motion also seeks permission for the Special Master to have *ex parte* communications with the parties to the Settlement Agreement, i.e., plaintiffs' counsel and their clients, Ethicon and its counsel, or the Court, and such *ex parte* communications shall not be deemed to have waived any attorney-client privileges. The Special Master shall be compensated privately as specified by agreement with the Special Master.

For reasons stated above, Zimmerman Reed LLP respectfully requests that the Court appoint the Hon. James Rosenbaum as Special Master for the private settlement agreement between Zimmerman Reed LLP and Ethicon, and enter an Order in the form submitted herewith.

DATED: April 24, 2018

ZIMMERMAN REED LLP,

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